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VIA EMAIL AND COURT FILING

The Honorable Katharine H. Parker
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 750
New York, New York 10007

Re: United States of America v. Anthem, Inc., 1:20-cv-02593-ALC-KHP

Dear Judge Parker:

I am a partner at O'Melveny & Myers LLP ("O'Melveny") and counsel for Defendant Anthem, Inc. ("Anthem") in the above-captioned matter. Anthem respectfully submits materials for *in camera* review in connection with Anthem's Letter Regarding Plaintiff's Motion to Compel, filed simultaneously with this letter.

Anthem is submitting these materials *in camera* because they reflect attorney-client privileged information relevant to the parties' dispute. The submission includes the as-filed version of Anthem's Letter Regarding Plaintiff's Motion to Compel, and privileged Exhibits attached to the Declaration of Leah Hirsch in Support of Anthem's Letter and the Supplemental Declaration of James A. Bowman in Support of Anthem's Letter. For the convenience of the Court, Anthem also includes unprivileged exhibits attached to those declarations, which will also be filed on the public docket.

Because the Supplemental Declaration of James A. Bowman contains privileged information, the as-filed version contains redactions of that privileged information. Anthem's *in camera* submission includes both the as-filed redacted version and the unredacted version.

To facilitate the Court's review, all *in camera* materials have been compiled into a ZIP file, which will be transmitted to the email address Parker_NYSDChambers@nysd.uscourts.gov.

The ZIP file contains the following subfolders:

1. Anthem's Letter Regarding Plaintiff's Motion to Compel
2. Declaration of Leah Hirsch in Support of Anthem's Letter and Exhibits
3. Declaration of James A. Bowman in Support of Anthem's Letter and Exhibits

We appreciate the Court's attention to these materials and are available to provide any further information the Court may require for its resolution of Plaintiff's Motion and Anthem's privilege assertions.

Sincerely,

/s/ James A. Bowman

James A. Bowman
of O'MELVENY & MYERS LLP
Counsel for Defendant Anthem, Inc.